

KERRY M. L. SMITH, OSB# 88103  
SMITH & FJELSTAD  
722 N. Main Avenue  
Gresham, Oregon 97030  
Telephone: (503)669-2242  
Facsimile: (503)669-2249  
[smithandfjelstad@frontier.com](mailto:smithandfjelstad@frontier.com)

LISA A. AMATO, OSB# 920253  
WYSE KADISH LLP  
621 SW Morrison, Suite 1300  
Portland, Oregon 97205  
Telephone: (503) 228-8448  
Facsimile: (503) 273-9135  
[laa@wysekadish.com](mailto:laa@wysekadish.com)

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

MESERET T. SADO d.b.a. JBS Residential  
Living Program,

Plaintiff,

v.

STATE OF OREGON DEPARTMENT OF  
HUMAN SERVICES Seniors and People  
with Disabilities; MULTNOMAH COUNTY;  
and BARBARA SOUTHARD, KAREN  
CURRY, SHARI DAVIS, and SHARELL  
COLLINS in their individual capacities,

Defendants.

Civ. No. 10-1050-ST

PLAINTIFF'S RESPONSE TO  
DEFENDANTS MULTNOMAH COUNTY,  
KAREN CURRY, SHARI DAVIS and  
SHARELL COLLINS' MOTION TO  
DISMISS

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CURRY, SHARI DAVIS and SHARELL COLLINS' MOTION TO DISMISS

Ms. Sado concedes all four of the motions and has prepared a proposed Second Amended Complaint which addresses all of the issues raised in the motions. Ms. Sado seeks permission to file the Second Amended Complaint and has sought permission from both defense counsel to file the Second Amended Complaint. Counsel for the State of Oregon and for Ms. Southard has consented to the amendment. Counsel for Multnomah County and defendants Curry, Davis and Collins has also consented.

Dated: December 16, 2010.

SMITH & FJELSTAD

By: /s/ Kerry M. L. Smith  
Kerry M. L. Smith  
OSB No. 88103  
Lisa A. Amato  
OSB No. 920253  
Of Attorneys for Plaintiff